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 Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

* * *

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; DOES I-
 X; ROE Business Entities I-X; Mark
 Broadhurst; Mike York; and Chase Swanson,
 Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Stipulation and Order to Extend Deadline for
 Response and Reply to Defendants Mark
 Broadhurst's and Chase Swanson's Motions to
 Dismiss (ECF No. 60 + 61)

[Third Request]

Pursuant to Local Rule 6-1, Defendant K-Kel, Inc. ("Defendant") and Plaintiff Julie Danou Hanna ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to a four (4) week extension of Plaintiff's deadline to file an Opposition to Defendants Mark Broadhurst's and Chase Swanson's Motions to Dismiss (ECF No. 60 + 61) and of Defendants' deadline to file a Reply to Plaintiff's Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	April 18, 2022	May 16, 2022
Defendant's Reply Deadline	May 2, 2022	May 30, 2022

This is the third request for an extension of these deadlines. The requested extension is sought in good faith and not for purposes of undue delay.

GOOD CAUSE FOR EXTENSION OF DEADLINES

This extension is necessitated by the withdrawal of Plaintiff's counsel Kathryn Black from this matter. Ms. Black was the lead attorney representing Plaintiff in the absence of Nicole Diaz, who is out on extended leave. Gilbert Employment Law P.C. is actively working to reassign Ms. Black's case duties and responsibilities, which include preparing Plaintiff's Oppositions to the Motions to Dismiss filed by Defendants Broadhurst and Swanson. However, the firm is currently facing staffing shortages due to a number of employees being out on medical or other leave. A four-week extension would allow Plaintiff's counsel to reassign Ms. Black's responsibilities appropriately and with consideration for the staffing shortages as well as the heavy litigation schedule faced by the remainder of Plaintiff's counsel over the next few weeks.

Respectfully Submitted,

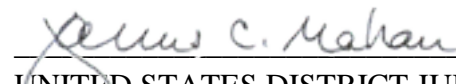
DATED 4/15/2022

/s/ Gary Gilbert
 Gary M. Gilbert, Esq.
Pro Hac Vice
 Attorney for Plaintiff

/s/ Allison Kheel
 Allison Kheel, Esq.
 Nevada Bar No. 12986
 Attorney for Defendants

ORDER

IT IS SO ORDERED.


 UNITED STATES DISTRICT JUDGE

Dated: April 18, 2022.

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